

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

PAINTERS DISTRICT COUNCIL NO. 30,	)	
	)	
Plaintiff,	)	08 C 1163
v.	)	
	)	
VINCO PAINTING INC.,	)	Judge Conlon
	)	Magistrate Judge Ashman
Defendant.	)	
	)	

**DEFENDANT'S ANSWERS TO PLAINTIFF'S REQUESTS FOR ADMISSION**

Defendant, Vinco Painting, Inc. provides the following Answers to Plaintiff's Requests for Admission of Facts and Genuineness of Documents:

1. As of January 30, 2008, the address that Vinco had most recently reported to the Union as its mailing address was 6649 N. Ogallah Ave., Chicago, IL 60631.

**ANSWER:** Deny.

2. As of January 22, 2008, the address that Vinco had most recently reported to the Union was 6649 N. Ogallah Ave., Chicago, IL 60631.

**ANSWER:** Deny.

3. As of January 3, 2008, the address that Vinco had most recently reported to the Illinois Secretary of State for its Registered Agent was 6649 N. Ogallah Ave., Chicago, IL 60631.

**ANSWER:** Deny.

4. As of January 22, 2008, the address that Vinco had most recently reported to the Illinois Secretary of State for its Registered Agent was 6649 N. Ogallah Ave., Chicago, IL 60631.

**ANSWER:** Deny.

5. As of the present date, the address for Vinco's Registered Agent indicated on the Corporate Search web site of the Illinois Secretary of State is 6649 N. Ogallah Ave., Chicago, IL 60631.

**ANSWER:** Admit.

6. The document attached as Exhibit 7 to Plaintiff's Rule 26(a)(1) Disclosures is a true and correct copy of the collective bargaining agreement effective May 1, 2004, through April 30, 2008, between the Union and the Finishing Contractors Association of Illinois and various individual painting, decorating and drywall finishing contractors (the "CBA").

**ANSWER:** Admit.

7. The document attached as Exhibit 8 to Plaintiff's Rule 26(a)(1) Disclosures is a true and correct copy of a signature page executed by Vince Angelilli on behalf of Vinco on August 30, 2007.

**ANSWER:** Admit.

8. Vinco was bound to the CBA during the period August 30, 2007, through April 30, 2008.

**ANSWER:** Admit.

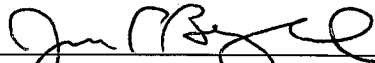
9. Vinco received a copy of the document attached as Exhibit 2 to Plaintiff's Rule 26(a)(1) Disclosures prior to receiving Plaintiff's Rule 26(a)(1) Disclosures.

**ANSWER:** Deny.

10. Vinco received a copy of the document attached as Exhibit 3 to Plaintiff's Rule 26(a)(1) Disclosures prior to receiving Plaintiff's Rule 26(a)(1) Disclosures.

**ANSWER:** Admit.

Respectfully submitted,

  
One of the Attorneys for the Defendant

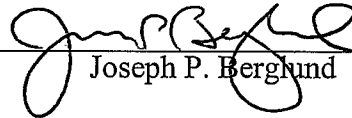
Joseph P. Berglund  
Kenneth M. Mastny  
Berglund & Mastny, P.C.  
900 Jorie Blvd, Suite 122  
Oak Brook, IL 60523  
(630) 990-0234

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury under the law of the United States of America, that I served the *Defendant's Answers to Plaintiff's Requests for Admissions* upon the following individual(s):

David Huffman-Gottschling  
Jacobs, Burns, Orlove, Stanton & Hernandez  
122 South Michigan Ave., Ste. 1720  
Chicago, Illinois 60603

at the address indicated, by depositing same in the U.S. Mail, postage fully prepaid, at 900 Jorie Blvd., Oak Brook, Illinois, on this 27th day of May, 2008.

  
\_\_\_\_\_  
Joseph P. Berglund

BERGLUND & MASTNY, P.C.  
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